

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROHM AND HAAS ELECTRONIC
MATERIALS LLC,

Plaintiff,

V.

HONEYWELL ELECTRONIC
MATERIALS INC.,
HONEYWELL SPECIALTY
MATERIALS, LLC,
and HONEYWELL INTERNATIONAL INC.,

Defendants.

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Civil Action No. 06-297-GMS

**STIPULATION AND ORDER OF VOLUNTARY DISMISSAL OF
DEFENDANTS HONEYWELL ELECTRONIC MATERIALS INC. AND
HONEYWELL SPECIALTY MATERIALS, LLC**

Pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure, Plaintiff Rohm and Haas Electronic Materials LLC (“Plaintiff” or “Rohm and Haas”) and Defendants Honeywell Electronic Materials Inc., Honeywell Specialty Materials, LLC and Honeywell International Inc. (respectively “HEM”, “HSM” and “Honeywell International”; collectively, “Honeywell”), through their undersigned attorneys, STIPULATE AND AGREE that:

1. HEM and HSM are wholly-owned subsidiaries of Honeywell International, and have been named by Rohm and Haas as co-defendants to Honeywell International in the above-captioned action.

2. HEM and HSM shall be voluntarily dismissed from the above-captioned action.

3. Honeywell International assumes full responsibility for all liability, if any, arising from the alleged infringing activity set forth in Plaintiff's Complaint, unless and until HSM and/or HEM are rejoined by Rohm and Haas as provided in Paragraph 4 below.

4. Rohm and Haas reserves the right to seek joinder of either HEM and/or HSM in the event that discovery reveals a connection between HEM and/or HSM and the alleged infringing activity set forth in Plaintiff's Complaint.

5. Should Rohm and Haas exercise its right to seek joinder of either HEM and/or HSM pursuant to Paragraph 4, Honeywell reserves the right to object to, or move to dismiss, any such claim(s) made by Rohm and Haas against HEM and/or HSM.

6. Honeywell International agrees that it will not object to discovery requests made by Rohm and Haas in connection with the above-captioned litigation on the basis that HEM and/or HSM are not parties to this action.

7. The voluntary dismissal of HEM and HSM shall be without prejudice and with each party bearing its own costs and fees in connection with this dismissal.

8. The Parties understand and agree that this Stipulation shall be entered as an Order of the Court.

Respectfully submitted this 15th day of September 2006.

CONNOLLY, BOVE, LODGE & HUTZ LLP

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP

/s/ Rudolf E. Hutz

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Attorneys for Defendants

IT IS SO ORDERED:

HON. GREGORY M. SLEET
United States District Judge

DATED: September __, 2006